

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

**RECOVERY LIMITED PARTNERSHIP,
Plaintiff,**

v.

Civil Action No.: 2:87-cv-00363

**UNIDENTIFIED, WRECKED AND ABANDONED
SAILING VESSEL, etc.,
Defendant.**

STATUS REPORT TO COURT

Recovery Limited Partnership (the “Plaintiff” or “RLP”), by counsel, respectfully submits this Report to the Court as salvor-in-possession of the wreck of the S.S. CENTRAL AMERICA. Plaintiff has previously submitted thirty reports, two in Civil Action No. 2:14-cv-160, and twenty-eight in Civil Action No. 2:87-cv-363. *See* ECF # 21 and 90 (No. 2:14-cv-160); ECF # 104, 130, 163, 175, 176, 177, 195, 202, 209, 233, 256, 264, 267, 273, 278, 280, 281, 289, 290, 291, 292, 293, 294, 295, 303, 304, 323, and 330 (No. 2:87-cv-363).

As reported in November 2024 (ECF # 330), the Trustee, John Pidcock, together with RLP’s salvage adviser, Craig T. Mullen, were actively planning the 2025 salvage operation and initially identified four potential salvors. Each candidate’s qualifications, equipment, and vessel availability were under evaluation to ensure they possessed the capabilities to adhere to the operational requirements previously authorized by the Court. ECF # 321, 330.

Since then, the Trustee has continued to work with Mr. Mullen on planning for the next salvage operation in 2025. While broader industry challenges stemming from shifts in the federal administration have created uncertainty in offshore operations, the Trustee and Mr. Mullen have identified CanPac Marine Services Inc. (“CanPac”) as the lead salvor. CanPac is based in the Port of Vancouver, Canada and has been providing marine services to offshore, coastal, and inland

sectors since 1965. It possesses the necessary deep-water expertise, equipment, and vessel availability to execute the salvage successfully. For confidentiality, the Trustee has withheld detailed information regarding CanPac from this report but stands ready to submit this information under seal should the Court wish to review it at this time.

Salvage planning is actively underway and is expected to be finalized within the first quarter of 2025. To ensure transparency, the Trustee will provide updates to the Court every 30 days and anticipates submitting a formal salvage plan on or before March 31, 2025 for the Court's consideration and subject to its approval. The plan is expected to align closely with the operations previously authorized by the Court. ECF #321.

The Trustee is aware that exclusive jurisdiction over the salvage of the wreck of the S.S. CENTRAL AMERICA lies with this Court. He understands his obligation to notify this Court regarding any future salvage and will seek advance approval before any such salvage is performed in accordance with the Order entered January 11, 2019. ECF # 276.

The Trustee and counsel are available to address any questions that the Court may have regarding this report.

This 31st day of January, 2025.

/s/ James L. Chapman, IV
James L. Chapman, IV, Esquire (VS. No. 21983)
K. Barrett Luxhoj, Esquire (VS. No. 86302)
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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of January, 2025, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered filers.

/s/ James L. Chapman, IV

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